



Cowan, Liebowitz & Latman, P.C.
1133 Avenue of the Americas
New York, NY 10036
(212) 790-9200 Tel
(212) 575-0671 Fax
www.cll.com

Peter R. Porcino
(212) 790-9208
prp@ccll.com

MEMORANDUM

January 9, 2012 This request is respectfully

referred to the assigned magistrate

By Hand

Hon. Andrew L. Carter
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
Courtroom 14A
New York, NY 10007-1312

judge. SO ORDERED.

Andrew L. Carter
1-9-12

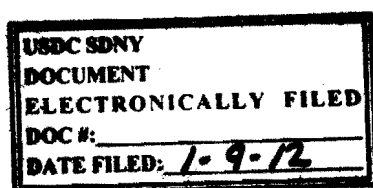
Re: Mazaya Trading Co., SARL v. VCS Group, LLC, 11cv3195

Dear Judge Carter:

We are the attorneys for Plaintiff Mazaya Trading Co., SARL, in the captioned action. We were informed that the case has been re-assigned to Your Honor. The parties appeared before Judge Pauley on December 2, 2011 for the initial case conference, following which Judge Pauley issued a Scheduling Order. We enclose a copy of the Scheduling Order for your convenience. During the conference, Judge Pauley suggested that the parties seek mediation, and the parties agreed. He stated that he would stay all discovery activity until the middle of January to allow a mediation to proceed.

The parties subsequently agreed to a private mediation and had scheduled the mediation for January 10. The parties exchanged mediation briefs last week. Our client is a Lebanese-based corporation, and my client suffered an injury over the weekend that is preventing him from flying. Without the principal being able to attend, we were forced to postpone the mediation, but both parties have expressed a desire to re-schedule it.

It appears that it will be a few weeks before we can hold the mediation. While Judge Pauley did not formally set down the stay of discovery, we thought it would be prudent to notify Your Honor and request a continuation of the stay for a few more weeks. We respectfully request a 30 day extension. The parties also seek a 30 day extension of all discovery dates and deadlines set forth in the Scheduling Order to allow the mediation to proceed. This request is on consent of all parties.



Cowan, Liebowitz & Latman, P.C.

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Thank you for your consideration.

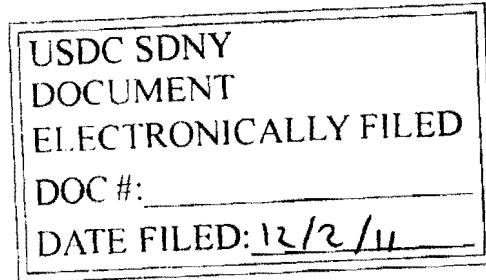
Respectfully submitted,

A handwritten signature in dark ink, appearing to read "P. Porcino", written in a cursive style.

Peter R. Porcino

Enclosures

cc: Jed Ferdinand, Esq. (via e-mail)(w/enclosure)



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

MAZAYA TRADING CO. SARL,

Plaintiff,

-against-

VCS GROUP LLC,

Defendant.

-----X

11 Civ. 3195 (WHP)

SCHEDULING ORDER

WILLIAM H. PAULEY III, District Judge:

The parties having appeared for an initial pretrial conference on December 2, 2011, the following case schedule is entered on consent.

1. Fact discovery shall close on March 30, 2012;
2. Plaintiff is directed to make its initial expert disclosure by February 29, 2012;
3. Defendant is directed to make its initial expert disclosure by March 16, 2012;
4. Expert reports are to be exchanged no later than April 30, 2012;
5. Expert discovery shall close by May 31, 2012;
6. The parties are directed to submit a joint pretrial order on June 15, 2012; and

7. A final pretrial conference will be held on June 22, 2012 at 12:00 noon.

Dated: December 2, 2011
New York, New York

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

Counsel of Record:

Peter R. Porcino, Esq.
Cowan, Liebowitz & Latman, P.C.
1133 Avenue of the America's
New York, NY 10036
Counsel for Plaintiff

Thomas J. Kavalier, Esq.
Cahill, Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
Counsel for Defendant